

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

UNITED STATES OF AMERICA,

CASE NO.: 00-6039-CR

DIMITROULEAS

Plaintiff,

vs.

JOHN REECH,

Defendant.

**MOTION FOR EARLY TERMINATION OF PROBATION**

COMES NOW the Defendant, **JOHN REECH**, by and through his undersigned counsel, and requests that this Honorable Court terminate the remainder of his term of Probation, and as grounds therefore would state:

1. On May 5, 2000, the Defendant was sentenced by the Honorable William Dimitrouleas on one Count of Interstate Transportation of Lottery Tickets.
2. The sentence imposed was two and a half years of probation and \$2,100.00 in fines.
3. The Defendant has completed one year and one and a half months of that probation and has paid all of his assessments and fines in full.
4. The Defendant has been an exemplary probationer and has complied with all of the terms of his probation.
5. This case is the only contact the Defendant has ever had with the criminal justice system.

UNITED STATES OF FLORIDA WILLIAM A. H.

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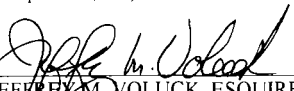
6. The Defendant is a tennis pro, and if his probation is terminated, he could receive a significant increase in pay which would greatly relieve him of financial pressure and enable him to better support himself and his child. (See Exhibit "A").

WHEREFORE the Defendant, **JOHN REECH**, prays for an Order granting this Motion and terminating the remainder of his probation.

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished this 3<sup>rd</sup> day of July, 2001 to the Assistant United State Attorney, Jeff Kaplan, 500 E. Broward Blvd., Suite 700, Fort Lauderdale, Florida 33394 and to Probation Officer, Viviana Bibliowicz, 299 E. Broward Blvd., Room 409, Fort Lauderdale, Florida 33301.

JEFFREY M. VOLUCK, P.A.  
Counsel for Defendant  
Courthouse Square, Suite 201  
200 Southeast Sixth Street  
Fort Lauderdale, Florida 33301  
Telephone: (954) 467-8989

By:

  
JEFFREY M. VOLUCK, ESQUIRE  
FLORIDA BAR NO.: 0113750



June 27, 2001

Dear Mr. Voluck,

I have previously discussed an open position of assistant tournament and special events coordinator with John Reech. Having this position could be a significant increase in pay, which would amount to \$250.00 per week, or roughly \$1,000.00 per month. This would help alleviate some of the financial pressure having a family represents.

Based on the work ethic and past performance of John Reech, Sans Souci Tennis Center would greatly benefit from this promotion, however, we will not be able to approve him while his probationary situation remains status quo.

I have asked John to keep me posted on the status of his probation, for this position needs to be filled in the near future.

Best Regards,

Ross Dubins  
Director of Tennis  
Sans Souci Tennis Center

SANS SOUCI TENNIS CENTER  
1795 Sans Souci Boulevard North Miami, 33181

EXHIBIT "A"